

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

**LUCAS CRANOR individually and on)
behalf of all others similarly situated,)**

Plaintiffs,)

Case No. 4:18-cv-00628-FJG

v.)

**THE ZACK GROUP, INC.,)
LYNN CARE, LLC,)**

Defendants.)

**PLAINTIFFS' UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FEES,
LITIGATION EXPENSES, COURT COSTS AND INCENTIVE PAYMENTS**

Plaintiff and Class Representative Lucas Cranor, through undersigned Class Counsel, respectfully moves for an Order for an incentive award for the Class Representative, attorneys' fees, litigation expenses and court costs. As explained in Plaintiff's concurrently filed Suggestions in Support, the requested awards are reasonable and should be granted.

ACCORDINGLY, Plaintiff respectfully moves the Court for an Order awarding the Class Representative \$10,000.00 as an incentive award as compensation for his contributions to this class action, for an award of attorneys' fees in the amount of \$500,000.00 representing one third of the settlement amount, and \$21,716.89 as reasonably expended costs.

Respectfully Submitted,

/s/Keith J. Keogh

Keith J. Keogh (*pro hac vice*)
Theodore Kuyper (*pro hac vice*)
55 W. Monroe Street
Suite 3390
Chicago, IL 60603
Tel: 312-726-1092
keith@keoghlaw.com

A.J. Stecklein #46663
Michael H. Rapp #66688
Stecklein & Rapp, Chartered
748 Ann Ave
Kansas City, KS 66101
Telephone: (913) 371-0727
Facsimile: (913) 371-0727
aj@kcconsumerlawyer.com
mr@kcconsumerlawyer.com

Class Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 18, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and thereby served it on all parties.

/s/Keith J. Keogh
Attorney for Plaintiff